

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Trudy B. Grant, Sarah Krawcheck,)
Nashonda Hunter, Max Milliken,)
Jordan Mapp, and Caleb Clark,)

Plaintiffs,)

v.)

Howard Knapp as the Executive)
Director of the South Carolina)
Election Commission, Dennis Shedd)
(Chair), JoAnne Day, Clifford J.)
Edler, Linda McCall and Scott)
Moseley, as Members of the South)
Carolina Election Commission, and)
Charleston County Board of)
Elections and Voter Registration,)

Defendants.)

Case No.: 2:23-cv-06838-BHH

Plaintiff Milliken's Answers to State Defendants' First Interrogatories

Plaintiff Max Milliken provides the following answers to Election Defendants' First Set of Interrogatories.

Definitions and Instructions are as specified in the Interrogatories, with the following supplementation:

Plaintiff Milliken was only 8 years old in 2008, so answers to Interrogatories 1, 2 and 6 are provided for all dates since plaintiff Milliken became 18 years old and thus eligible to vote.

To clarify, the word "absentee" is understood to be the same as mail-in voting, as defined in current state law, not early voting, which was considered absentee voting under the immediate prior law.

ANSWERS

1. For each of the Plaintiffs, state your full name, any/and all prior names, including aliases or nicknames, dates of birth, Social Security numbers, your current address, and all addresses for the years 2008 through the present. For each address, document the inclusive months and years you lived at each address and whether you owned or rented each address.

Answer: Max Robert Milliken, no other names; DOB [REDACTED] 2000; SSN [REDACTED] Current address: [REDACTED], 29412; Parents' home: This has been plaintiff Milliken's address before and since 11/2/2018.

Plaintiff Milliken has also had the following college or other temporary addresses during this period:

[REDACTED]: August 2019-March 2020 (Dorm Room);
[REDACTED] August 2020-July 2021 (Rental);
[REDACTED] August 2021-July 2022 (Rental);
[REDACTED] August 2022-August 2023 (Rental); and
[REDACTED] August 2023-June 2024 (Rental).

2. For each of the Plaintiffs, describe the date and the precinct, county, and state in which you are or have been registered to vote for the years 2008 through the present. Document the inclusive months and years you were registered to vote in each precinct, county, and state.

Answer: At all times since 2018, plaintiff Milliken has been registered to vote in James Island Precinct 14, Charleston County, SC.

3. For each of the Plaintiffs, describe every election in which you voted by year and type of election, (*e.g.* primary, general, special).

Answer: 2018 (General), 2019 (James Island municipal), 2020 (Presidential primary, state primary, special election, general election), 2022(primary and general election), 2024 (primary).

4. For each of the Plaintiffs, for every election described in response to Interrogatory number 3, indicate:

- a. the method of voting you used; and
- b. whether you requested an absentee ballot application, and if so, the county board of voter registration and elections to which the request was made, the absentee application excuse identified on the request, whether the application was granted or denied, and if denied, the reason for the denial.

Answer: a. Voted in person on Election Day in each instance.
b. No.

5. For each of the Plaintiffs, describe all election(s) in which you were unable to cast a ballot because you could not vote absentee by mail and the reason you were unable to cast a ballot on election day in this election.

Answer: None.

6. For each of the Plaintiffs, describe your employment status for the years 2008 through the present. For each employer or school listed, document the inclusive months and years you were employed or in school, the address of the employer or school, and the date of graduation if applicable.

Answer: College of Charleston: August 2019-2022, Graduated May 6th, 2022.


Since graduation, plaintiff Milliken has held several jobs, with the following being the most significant:

Duvall Catering and Events, 2816 Azalea Drive (until February 2023);
Starlight Motor Inn Burgundy Lounge, 3245 Rivers Ave. (January – June 2023); and
Dalila's, 441 Meeting St, Suite F. (June 2023- June 2024).

7. For each of the Plaintiffs, state whether you contend that you currently qualify or have ever qualified to vote absentee under S.C. Code Ann. §§ 7-15-110, 7-15-320, 7-15-600, *et. seq.*, or any other current or former provision of Title 7 of the S.C. Code Ann., and describe the qualification.

Answer: Plaintiff Milliken does not contend that he has ever met any of the criteria for absentee voting but may in the future meet one or another of the conditional criteria (employment, jail, emergency hospital, attending the sick, being or out of the county).

Under penalty of perjury, I declare that the foregoing answers are true and correct.

 7-1-24
Max Milliken Date

Date: July 2, 2024

s/Armand Derfner

Derfner & Altman, LLC

Armand Derfner, Fed. ID No. 528

Jonathan S. Altman, Fed. ID No. 5796

575 King Street, Suite B

Charleston, SC 29403

aderfner@derfneraltman.com

jaltman@derfneraltman.com

Telephone: (843) 723-9804

Susan K. Dunn, Fed. ID No. 647

37 Charlotte Street, Suite A

Charleston, SC 29403

susandunn1950@gmail.com

Telephone: (843) 830-1571

Chad W. Dunn, Esq. (*Pro Hac Vice*)

Brazil & Dunn, LLP

1900 Pearl Street

Austin, TX 78705

chad@brazilanddunn.com

Telephone: (512) 717-9822

Attorneys for Plaintiffs